

Message

From: Fawcett, Daniela (DEC) [daniela.fawcett@alaska.gov]
Sent: 8/15/2019 11:42:51 PM
To: Pavitt, John [Pavitt.John@epa.gov]
Subject: RE: AQ0183TVP01 FCE - BP Exploration (Alaska), Inc., Gathering Center No.2
Attachments: ATT00001.txt

OK, in that case I missed it. I did not see any emissions units there only checked all submitted reports and checked with permit conditions. The last revision was in 2008.

I would be so useful if I could be part of the on-site visit, I have never been at the facilities so I have no idea how it looks there and how well pads or production look like plus the subpart OOOO was why EPA went along. Hopefully some time the scheduling will be better for my busy schedule.

Thank you so much for pointing it out

Daniela P Fawcett

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From: Pavitt, John [mailto:Pavitt.John@epa.gov]
Sent: Thursday, August 15, 2019 3:28 PM
To: Fawcett, Daniela (DEC) <daniela.fawcett@alaska.gov>
Cc: Mallinger, Hunter L (DEC) <hunter.mallinger@alaska.gov>
Subject: RE: AQ0183TVP01 FCE - BP Exploration (Alaska), Inc., Gathering Center No.2

9 of the well pads that send crude oil to GC#2 are subject to NSPS subpart OOOOa which went into effect in 2015. BP submits an annual report to EPA and ADEC on their compliance with subpart OOOOa and talks about their leak monitoring and repairs as required by the rule. The well pads have applicable federal requirements even if the permit doesn't say anything about this subpart.

The permit has a condition that says they must comply with new federal air rules that become effective after the permit is issued, which is the case here.

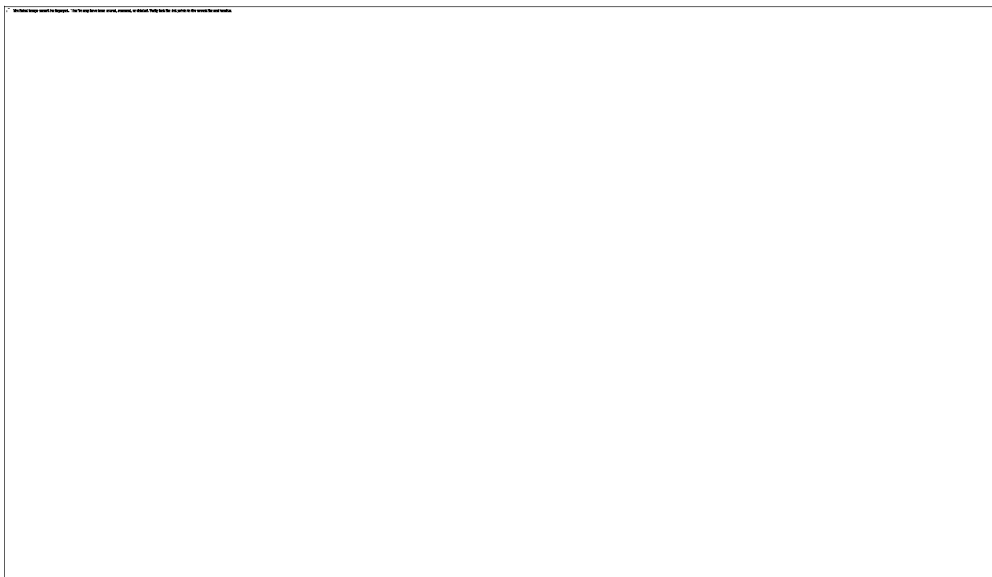
However, I don't want to push too much on this point because BP requested that the well pads be disaggregated from the permit. If approved, this won't be a relevant point anymore .

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10
Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688

From: Fawcett, Daniela (DEC) <daniela.fawcett@alaska.gov>
Sent: Thursday, August 15, 2019 11:58 AM
To: Pavitt, John <Pavitt.John@epa.gov>
Cc: Mallinger, Hunter L (DEC) <hunter.mallinger@alaska.gov>
Subject: RE: AQ0183TVP01 FCE - BP Exploration (Alaska), Inc., Gathering Center No.2

There are well pads listed in the Permit EU IDs table but they do not have any assigned EU ID. The Permit above the Source Inventory says: There are no permanent significant emission units (sources) at the PBU well pads associated with the GC#2 stationary source (facility), except at W Pad. That's why I did not include the Well Pads into Significant Emission Inventory table since I do not have any Units to list there. I hope that I understood it correctly. If you do interpret it another way, please let me know and we can discuss it and I can correct it in the future report or if we agree on that I made a mistake not to include those I can update the report and submit amended report to the original one. Please let me know what you think.



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From: Pavitt, John [<mailto:Pavitt.John@epa.gov>]
Sent: Thursday, August 15, 2019 11:40 AM
To: Fawcett, Daniela (DEC) <daniela.fawcett@alaska.gov>
Cc: Mallinger, Hunter L (DEC) <hunter.mallinger@alaska.gov>
Subject: FW: AQ0183TVP01 FCE - BP Exploration (Alaska), Inc., Gathering Center No.2

I have a question about this FEC report.

I quickly scanned the report and didn't see any mention of the Well Pads which are listed on the permit emission unit inventory.

Q: has BP's request to disaggregate the well pads been approved?

p.s. – nice picture of a Cariboo wandering around the facility!

Sincerely,

John Pavitt, Air Compliance Inspector
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From: Swasey, Dillon D (DEC) <dillon.swasey@alaska.gov>

Sent: Thursday, August 15, 2019 8:14 AM

To: kollin.fencil@bp.com

Cc: Pavitt, John <Pavitt.John@epa.gov>; Coss, Pablo M (DEC) <Moses.coss@alaska.gov>; Turner, Thomas E (DEC) <tom.turner@alaska.gov>; Olds, Jason R (DEC) <jason.olds@alaska.gov>; Fawcett, Daniela (DEC) <daniela.fawcett@alaska.gov>

Subject: AQ0183TVP01 FCE - BP Exploration (Alaska), Inc., Gathering Center No.2

All recipients:

Please review or copy as required.

Thank you,

Dillon Swasey

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